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CLIENT/MATTER NUMBER  
641930-0006

April 4, 2022

**Via E-Mail**

N. Lindsay Simmons  
Attorney-Advisor  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

Re: Response to Notice of Violation under the Toxic Substances  
Act issued to Inhance Technologies LLC (the "NOV")

Dear Ms. Simmons,

As you know, I represent Inhance Technologies LLC ("Inhance") with regard to the above-referenced NOV. Consistent with ongoing discussions and our email correspondence from Thursday, March 31, 2022, this correspondence contains Inhance's response to requests raised in the NOV as it relates to its fluorinated packaging technology, Enkase.

Although Inhance disputes the allegations raised in the NOV as to its container fluorination services,<sup>1</sup> Inhance is pleased to confirm that Inhance has made process modifications such that no LCPFAC substances are imparted by the fluorination process. Attached as Exhibit A (partially redacted as "Confidential Business Information"), please find a description of relevant process changes. Attached as Exhibit B, please find lab data demonstrating the lack of LCPFAC substances identified in HDPE after fluorination to various levels. A description of the applied third-party lab procedures are attached as Exhibit C (partially redacted as "Confidential Business Information"). Such procedures are consistent with that used by EPA's Analytical Chemistry Laboratory in its March 4, 2021 "Rinses from Selected Fluorinated and Non-Fluorinated HDPE Containers" report.

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<sup>1</sup> Among other concerns, Inhance disputes that it manufactured any LCPFAC substances, that the fluorination of polyethylene would be considered a significant new use under 40 C.F.R. §721.10536 (the "LCPFAC SNUR") or that any LCPFAC substances incidentally created during the fluorination process were subject to the notification requirements of the LCPFAC SNUR.

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We would be happy to make ourselves available for further discussion should you have any questions about the technology or the lab results. We look forward to continuing to cooperate with EPA on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dorothy E. Watson'.

Dorothy E. Watson

DEW: